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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDI KRAJA, an individual;

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada Corporation;
VINCENT ROTOLO, an individual; ROE
Business Organizations I-X; and DOE
INDIVIDUALS I-X, Inclusive,

Defendants.

Case No. 2:15-cv-01983-APG-NJK

STIPULATION AND ORDER
APPROVING SUFFICIENCY OF BOND
PURSUANT TO FED. R. CIV. P. 62(b)

Plaintiff ANDI KRAJA (hereinafter “Plaintiff”) and Defendant BELLAGIO, LLC (hereinafter “Defendant”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On April 4, 2019, the Clerk entered judgment in favor of Plaintiff and against Defendant in the amount of \$500,000.00 based on the jury’s verdict, rendered on April 3, 2019 (the “Judgment”). (ECF No. 203.)

2. Rule 62(b) of the Federal Rules of Civil Procedure authorizes a party to obtain a stay of execution and other proceedings for enforcement of a judgment by posting a bond or other security.

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3. Plaintiff and Defendant have met and conferred on the amount of the bond and stipulate that a bond of \$550,000.00 would provide adequate security for Plaintiff in this action.

4. The parties enter into this stipulation solely for the purposes of agreeing on the sufficiency of the bond for purposes of Rule 62(b) and for no other purposes. As such, by entering into this stipulation, neither party intends to waive or agree to any reduction, increase or other amendment or change to the Judgment. Nor does either party intend to waive any claim, defense or any other legal right with respect to the Judgment or these proceedings. Each part expressly reserves all other rights.

Dated: May 3, 2019

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Respectfully submitted,

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/s/ James P. Kemp

/s/ Todd L. Bice

JAMES P. KEMP, ESQ.

TODD L. BICE, ESQ.

VICTORIA L. NEAL, ESQ.

ROBERT A. RYAN, ESQ.

KEMP & KEMP, ATTORNEYS AT LAW

PISANELLI BICE, PLLC

Attorneys for Plaintiff, ANDI KRAJA

Attorneys for Defendant, BELLAGIO, LLC

ORDER

IT IS SO ORDERED this. _____ day of May, 2019.

UNITED STATES DISTRICT COURT JUDGE